

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

LEGAL AID CHICAGO,	)	
	)	Case No. 1:23-cv-4809
Plaintiff,	)	
	)	Magistrate Judge Jeffrey Cummings
v.	)	
	)	
HUNTER PROPERTIES, INC.,	)	
	)	
Defendant.	)	

**DECLARATION OF HILARY FREY**

I, Hilary Frey, pursuant to 28 U.S.C. §1746, hereby declare as follows:

1. I have personal knowledge of the matters set forth in this declaration and would be competent to testify thereto at a trial or hearing in this matter.

2. I am the Acting President for Hunter Properties, Inc. (“Hunter Properties”). I have held my current position since January 1, 2023 and have been employed by Hunter Properties since June 1, 2001. My duties include managing Hunter Properties’ website and housing application process.

3. Hunter Properties is a family-owned Chicago-based building management company that rents directly to tenants in a variety of Chicago neighborhoods. It is a small business with seven employees that generates approximately \$1.2 million yearly in gross revenue. Hunter Properties focuses on lower priced housing options and serves lower income families.

4. Hunter Properties does not categorically exclude all prospective tenants with any history of an eviction case against them or apply its online rental application terms and conditions without exception.


5. Following the filing of this lawsuit, Hunter Properties revised its online rental application terms and conditions to more accurately reflect its prospective tenant screening

process. Hunter Properties carefully considers and reviews each rental application for a variety of criteria, including credit history, rental history, and income, and it affords prospective tenants the opportunity to explain negative information. Hunter Properties does not reject potential tenants with satisfactory credit histories.

6. In addition, well before the filing of this lawsuit, Hunter Properties initiated a policy of screening potential tenants for evictions only during the 12-month period prior to submission of their rental applications.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on: October 16, 2023

  
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Hilary Frey  
Acting President  
Hunter Properties, Inc.